

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTIAN MACKESY	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
CHRISTIAN MACKESY	:	
Respondent	:	CASE NO. 5-24-bk-01497
	:	
	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 29th day of July 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the Debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically, the Debtor's payment is only \$945.00 per month but his monthly net income on Schedule J is \$1,105.00 per month.
2. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
 - a. The Debtor has not provided to the Trustee copies of the 2023 Federal Income Tax returns as required by § 521(e)(2)(A).
3. The Trustee provides notice to the Court as to the ineffectiveness of Debtor(s) Chapter 13 Plan for the following reasons:
 - a. Counsel selects the presumptive reasonable fee, but the total amount requested is \$5,300.00.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A

Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 29th day of July 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

MICHAEL A CIBIK, ESQUIRE
CIBIK LAW, PC
1500 WALNUT ST, SUITE 900
PHILADELPHIA, PA 19102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee